

CASE NO. 5:21-CV-225-BO

Plaintiff,

$$V.$$

Defendants.

[illegible]

1. This motion is not interposed for the purposes of delay.
2. Counsel for the Plaintiff has been transitioning to a new law firm with the understandable complications of lacking support staff and office infrastructure.
3. Counsel for the Defendants has been transitioning from work out of an office due to the pandemic to work in an office with the understandable

complications of lacking support staff and office infrastructure.

4. Counsel for the Plaintiff and Defendants believe that they can conclude the discovery necessary to be able to file dispositive motions with an additional sixty (60) days.

Therefore, on behalf of both parties, the undersigned respectfully requests that the Court amend the Scheduling Order (DE 11) to allow the parties up to and including Monday, May 30, 2022, to conclude discovery and until Monday, June 27, 2022, to file dispositive motions.

Respectfully submitted, this the 8th day of March 2022.

/S/ VALERIE BATEMAN

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **MOTION TO
EXTEND DISCOVERY PERIOD AND TIME FOR FILING DISPOSITIVE
MOTIONS** was served by filing the document electronically via the CM/ECF
system, which will send notification of such filing to all counsel of record

This the 8th day of March 2022.

/S/ VALERIE BATEMAN
NEW SOUTH LAW FIRM